

Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

FIELD OFFICE: Stillwater Field Office, Carson City District

NEPA NUMBER: DOI-BLM-NV-C010-2012-0017-DNA

CASEFILE PROJECT NUMBER: NVN-079106 Geothermal Lease, Unit Agreement NVN-085819

PROPOSED ACTION TITLE/TYPE: ORMAT Nevada Inc. Geothermal Drilling Permit 83-7

LOCATION/LEGAL DESCRIPTION: T17N, R30E, Section 7

APPLICANT: ORMAT Nevada Inc.

A. Description of the Proposed Action and any applicable mitigation measures

ORMAT Nevada Inc. proposes to drill a production well as part of their exploration and development of their Salt Wells Geothermal Project located approximately 10 miles south of Fallon, Nevada, in Churchill County. An access road up to 50 feet wide would be constructed along with a pad approximately 300 feet by 350 feet to support the drilling rig. The proposed site is within the project area analyzed in Salt Wells Geothermal Energy Projects Final Environmental Impact Statement (FEIS) and Record of Decision signed on September 30, 2011.

B. Land Use Plan (LUP) Conformance

LUP Name: **Carson City Field Office Consolidated Resource Management Plan**

Date Approved: May 9, 2001

The proposed action is consistent with the applicable land use plan because it is clearly consistent with the following land use plan decisions, objectives, terms, conditions:

Objective 1: Encourage development of energy and mineral resources in a timely manner to meet national, regional and local needs consistent with the objectives for other public land uses.

Objective 2: Oil, gas, and geothermal exploration and production upon BLM land are conducted through leases with the Bureau and are subject to terms and stipulations to comply with all applicable federal and state laws pertaining to various considerations for sanitation, water quality, wildlife, safety, and reclamation. Stipulations may be site specific and are derived from the environmental analysis process.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

The proposed action is within the project area analyzed in the ORMAT Nevada Inc., Salt Wells Geothermal Energy Projects Final Environmental Impact Statement (FEIS) and Record of Decision signed on September 30, 2011. The proposed site has been culturally cleared.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Yes, environmental concerns, interests and resource values have not changed at all since the completion of the 2011 EIS. The range of alternatives in the 2011 EIS is still appropriate. The environmental constraints of the geothermal exploration have not changed and the proposed action is identical to that analyzed in Salt Wells Geothermal Energy Projects Final Environmental Impact Statement (FEIS) and Record of Decision signed on September 30, 2011.

3. Is the existing analysis valid in light of any new information or circumstances (such as, range- land health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Anticipated impacts to the resources have not changed and no new information or circumstances have been identified since signing the ROD on September 30, 2011. The proposed site uses existing access roads to the extent possible. The proposed action will not have any adverse effect on the human health or environment.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes, the 2011 EIS analyzed cumulative impacts on relevant resources. The cumulative impacts to public lands resulting from geothermal development would remain unchanged. The analyzed action is not different from the construction of the proposed well pads or exploration drilling.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes, the geothermal resource exploration operations were analyzed in the 2011 EIS which describes the public involvement. Consultation with other agencies and interested parties was conducted for that document. The Fallon Paiute Tribe will be notified via letter of the proposed construction of the well pads.

E. Persons/Agencies/BLM Staff Consulted

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Jason Wright	Stillwater Archaeologist	BLM Carson City District <i>for</i> 1-13-12
John Wilson	Stillwater Biologist	BLM Carson City District <i>for</i> 1-9-12

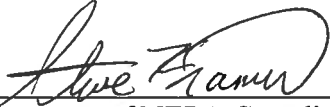
Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.



Signature of Project Lead



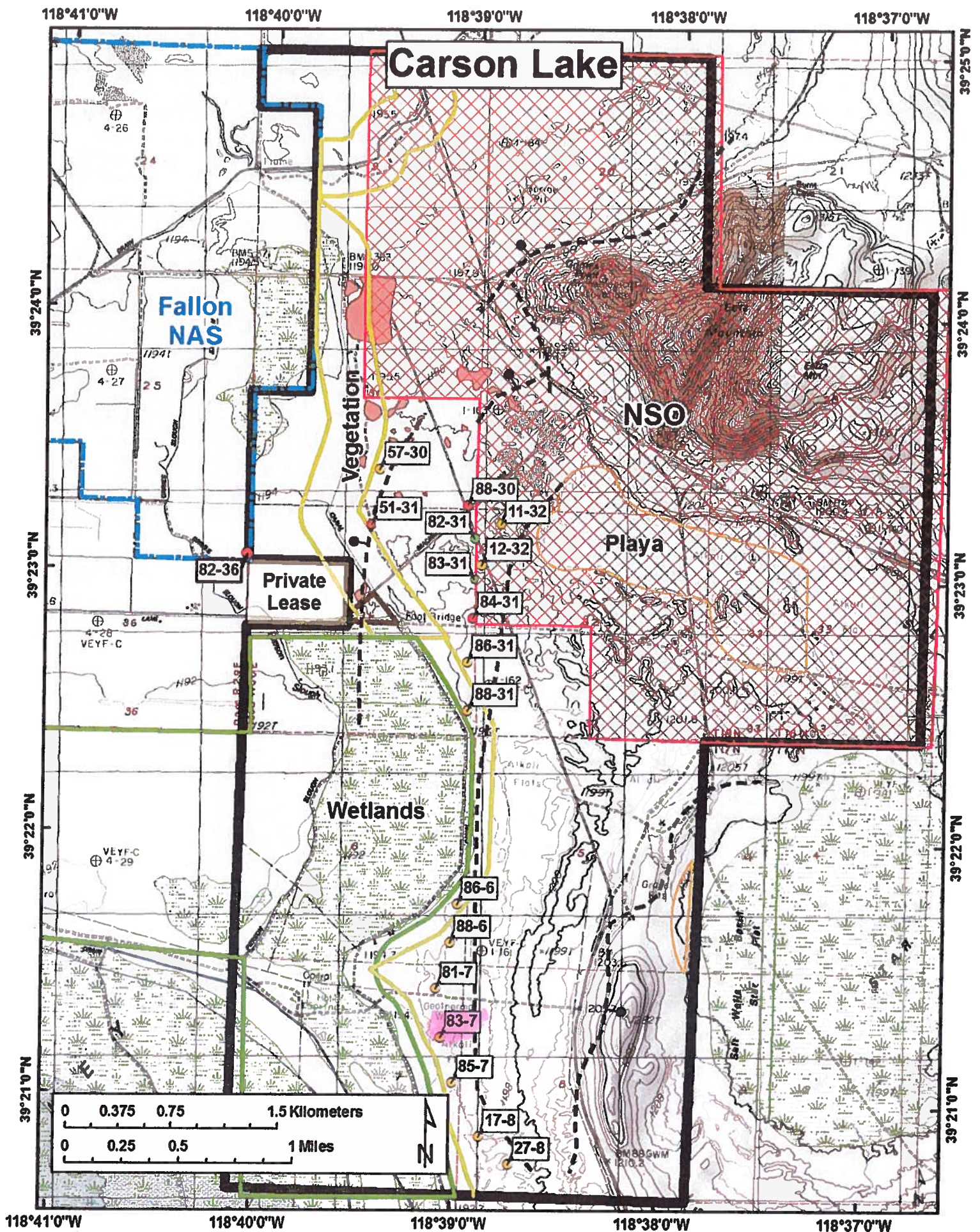
Signature of NEPA Coordinator

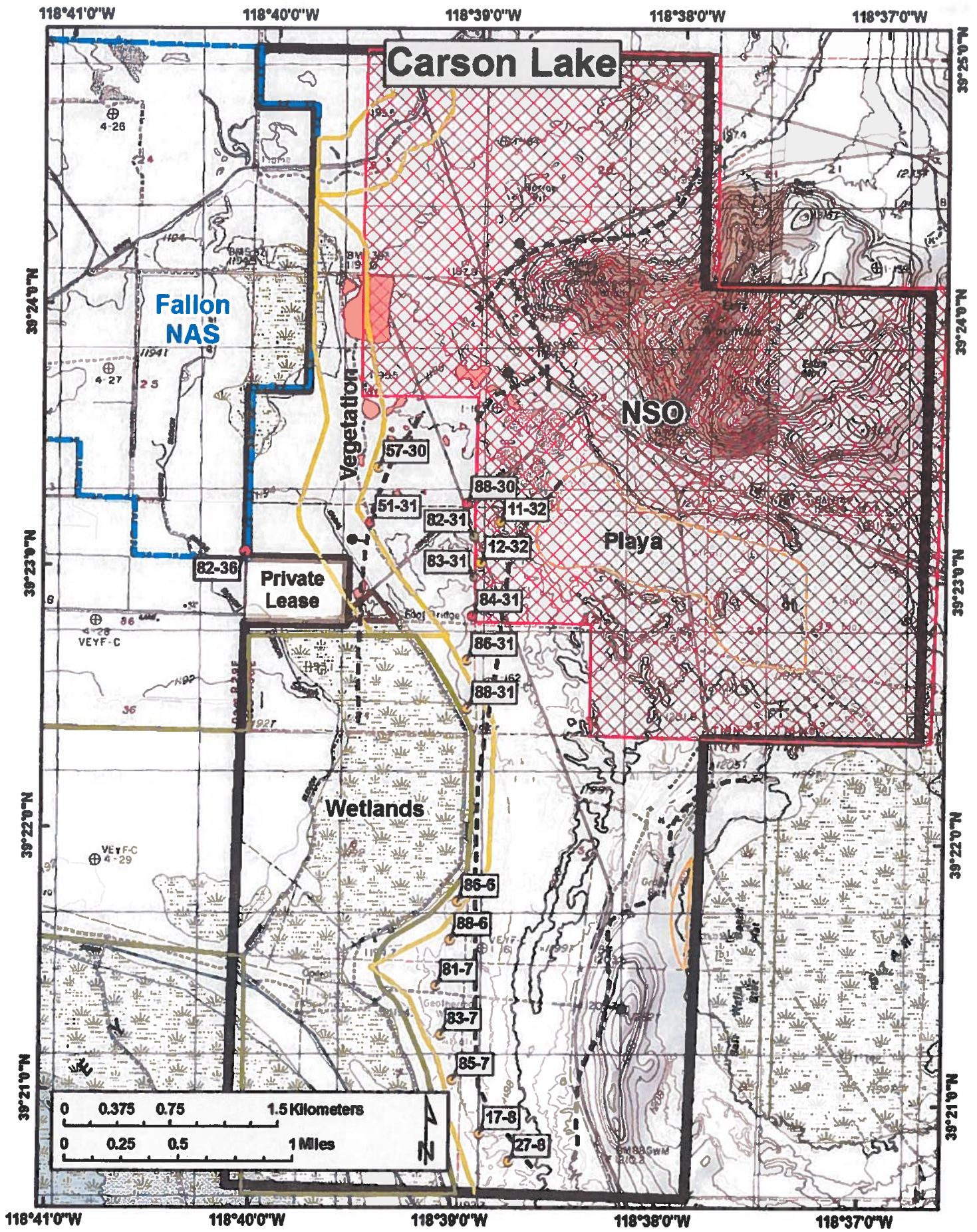


Signature of Responsible Official

Date 1/26/2012

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.





December 2011

ORMAT Nevada Inc, Carson Lake/Bunejug Geothermal Exploration Project

Stipulations

The following temperature gradient sites have been approved for drilling: 83-7

The following cultural requirements apply to permitted wells:

The project is a federal undertaking occurring on lands managed by the Bureau of Reclamation (cultural resources being managed in cooperation with Stillwater Field Office of the BLM) and these cultural stipulations conform to Part VI and Appendix H of the 2009 State Protocol Agreement (Discovery Situations and Avoiding Properties, respectively). The stipulations also meet NHPA requirements mandating the management of cultural resources for federal undertakings; NAGPRA requirements regarding the treatment of human remains and associated grave goods on federal lands; and Section 383 of the Nevada Revised Statutes regarding the protection of Native American human remains on private land.

The proposed undertaking is located on lands in which the potential exists for buried archaeological sites lacking a surface expression to be impacted by project implementation. Therefore, per Appendix H, Section A.5 of the 2009 State Protocol Agreement, a federally permitted archaeological monitor will be on-site during all initial ground disturbing activities related to the undertaking.

In the event that previously unidentified archaeological remains (other than human remains) are encountered at any time during exploration or development activities within the APE, the BLM must be notified within 24 hours. All work within 100 meters (330 feet) of the find will be halted, and the resource will be protected until a BLM-permitted archaeologist can assess the discovery and evaluate its significance. Work will not begin again within 100 meters of the discovery until the BLM Authorized Officer issues a Notice to Proceed. A Notice to Proceed can be issued under any of the following conditions:

- a. evaluation of potentially eligible resource(s) results in a determination that is not eligible for the NRHP;
- b. the resource is determined eligible for the NRHP and the fieldwork phase of archaeological data recovery or other treatment has been completed; and
- c. the BLM and BOR have accepted a summary description of the fieldwork performed and a reporting schedule for that work

If a resource is found to be ineligible for the NRHP, then the BLM and BOR will ensure that the find is documented according to standard procedures for the State of Nevada before work within 100 meters can recommence. If further treatment is required, an avoidance plan will be implemented to protect the resource but allow work to continue nearby.